

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,

LI MINJUN,

TU LAN,

ZHU FENG,

also known as “Johnny Zhu,”

KUANG ZEBIN,

also known as “Vincent Kuang,”

MICHAEL MCMAHON,

ZHAI YONGQIANG,

ZHENG CONGYING and

ZHU YONG,

also known as “Jason Zhu,

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**[PROPOSED] ORDER GRANTING
DEFENDANT MICHAEL
MCMAHON’S MOTION TO DISMISS
COUNTS I, II, III, AND IV OF THE
SUPERSEDING INDICTMENT AND
TO CHALLENGE VENUE AS TO
COUNTS II AND IV OF THE
SUPERSEDING INDICTMENT**

THIS MATTER having come before the Court upon the Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment and to Challenge Venue as to Counts II and IV of the Superseding Indictment of defendant Michael McMahon, by Gibbons P.C. (Lawrence S. Lustberg, Esq. and Genna A. Conti, Esq., appearing) and Law Offices of Brian J. Neary (Brian J. Neary, Esq., appearing), and the Court having considered the submissions of the parties and the arguments of counsel, and for good cause shown:

IT IS on this _____ day of _____ 202_,

ORDERED that Defendant’s Motion to Dismiss Counts I, II, III, and IV of the Superseding Indictment shall be and is hereby **GRANTED**;

OR, IN THE ALTERNATIVE, IT IS ORDERED that Defendant's Motion to Challenge Venue as to Counts II and IV of the Superseding Indictment shall be and is hereby **GRANTED**.

Honorable Pamela K. Chen
United States District Judge